SA HOME LOANS

Group Complaints Management Framework

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1. Introduction

1.1. This Framework applies to the SAHL Investment Holdings Group which includes consolidated special purpose entities (Collectively referred to as "the Group").

1.2. The framework addresses key complaint-handling deliverables as a measure of becoming more customer centric. It serves to adequately manage customer complaints as well as any conduct risk associated therewith, whilst meeting regulatory obligations.

2. Scope of application

2.1. This Framework will apply in all instances where a complaint arises out of a financial service and financial products rendered by SAHL Group or its representatives, any contravention of legislation or applicable Acts, unfair treatment or any other complaint SAHL Group is required to address by law.

2.2. Complaints must be handled in a fair, timely and transparent manner. Steps must be taken to investigate and respond to complaints promptly. When a complaint is received by an employee, they will determine what type of complaint it is and forward it to the relevant department.

3. Applicable Laws and Regulations

3.1. The Framework seeks to comply with the following applicable laws and principles

3.1.1. Policyholder Protection Rules

3.1.2. TCF Principles

3.1.3. Financial Advisory and Intermediary Services Act: General Code of Conduct for Authorised Financial Services Providers and Representatives, 2003, as amended.

3.1.4. National Credit Act 34 of 2005 and National Credit Regulations, 2006

3.1.5. Protection of Personal Information 4 of 2013

3.1.6. Any other applicable laws and regulations regulating the management of complaints within the financial services and credit lending sector.

4. Purpose and objectives of the Framework

4.1. The purpose of this Framework is to provide the foundation for implementing a consistent approach throughout the Group and, in turn, facilitate the Group's compliance with its regulatory obligations. The key principles, objectives and requirements below set out guidelines and the standard to which the Group holds itself to.

4.2. The Framework is supported by a **Group Complaints Management Standard Operating Process document** which outlines the detail obligations of each Business Units responsible for fulfilling the Group's obligations in complaints management.

5. Process and Procedure

5.1. The Group will abide by the following general principles on receipt of a complaint, irrespective of the business area the complaint relates to:

5.1.1. acknowledge receipt of the complaint and inform the complainant of the applicable complaints handling process and resolution timeline;

5.1.2. investigate the complaint competently, diligently and impartially, obtaining additional information as necessary;

5.1.2.1. assess fairly, consistently, and promptly:

5.1.2.2. the subject matter of the complaint;

5.1.2.3. whether the complaint should be upheld or rejected;

5.1.2.4. what remedial action or redress (or both) may be appropriate; and

5.1.2.5. if appropriate, whether the Group has reasonable grounds to be satisfied that another party may be solely or jointly responsible for the matter alleged in the complaint.

5.1.3. ensure that plain language is used in all communications with a complainant.

5.1.4. Having performed the above, the Group will:

5.1.4.1. explain to the complainant promptly and, in a way that is fair, clear and not misleading, the Group's assessment/investigation of the complaint, its decision on it;

5.1.4.2. provide reasons for the decision and provide possible recourse available for the complainant regarding the decision where the complaint is rejected;

5.1.4.3. offer redress or remedial action when appropriate (always seeking to put the complainant back in the position they were in before the cause of complaint occurred) and notify the complainant of the options available to them if they are still dissatisfied, notifying complainants of their right to approach the appropriate Ombudsman / Regulator (**Annexure A**); and

5.1.4.4. comply promptly with any offer of remedial action or redress accepted by the complainant.

5.1.5. The Group will take certain factors into account in the assessment/investigation of a complaint including the following:

5.1.5.1. all the available evidence and the circumstances of the complaint;

5.1.5.2. similarities with other complaints received by the Group; and

5.1.5.3. relevant guidance published by relevant regulators and/or the Ombudsman.

5.1.6. Complaints information will be recorded, scrutinised and analysed on an ongoing basis and will be utilised to:

5.1.6.1. proactively identify and manage conduct risks;

5.1.6.2. effect improved outcomes and processes for its clients; and

5.1.6.3. prevent reoccurrences of poor outcomes and errors.

6. Principles of our complaint's resolution procedure

6.1. This Framework is centered around the Treating Customers Fairly (TCF) principles to ensure that the Group consistently delivers fair outcomes to clients and takes responsibility for the business and staff (at all levels) providing an enhanced quality of service to clients, based on a culture of openness and transparency.

7. Confidentiality

7.1. All personal information and documents related to complaints lodged within the group will be kept confidential, apart from when exceptions apply and in accordance with the Privacy Policy of the Group found at https://www.sahomeloans.com/legal/sahl-privacy-policy

8. Reporting

8.1. Complaints identified from all the above monitoring activities concerning any serious expression of dissatisfaction by a complainant or identifiable trends (considering Treating Customers Fairly outcomes) are reported at high- level to the Group Board Committees for the relevant entities.

9. Exceptions

9.1. No exceptions or variations to the Framework will be allowed.

10. Revision

10.1. This Framework will be reviewed by the Senior Manager every 3 years and approved by the CEO and Risk and Compliance Director and endorsed by Audit Risk and Compliance Committee (ARCC).

Annexure A

FAIS Ombudsman	National Financial Ombuds Scheme	Financial Sector Conduct Authority	Information Regulator	National Credit Regulator
P.O Box 41 Menlyn Park 0063	P.O. Box 32334, Braamfontein 2198	P.O. Box 35655 Menlo Park 0102	P.O. Box 31533, Braamfontein, Johannesburg, 2017	127 - 15th Road Randjespark Midrand 1683
Tel: 012 762 5000 Sharecall: (0860) 663 274	Tel: (0860) 800 900	Tel: (012) 428 8000	Tel: (010) 023 5204	Tel: (011) 554 2700 0860 627 627
Email: info@faisombud.co.za	Email: info@nfosa.co.za	Email: info@fsca.co.za/complaints@fsca.co.za	Email: enquiries@inforegulator.org.za PAIAComplaints@inforegulator.org.za POPIAComplaints@inforegulator.org.za	Email: complaints@ncr.org.za Escalation: MHadebe@ncr.org.za
Fax	Fax: (0865) 757 000	Fax: (012) 346 6941	Fax:	Fax:
Website: www.faisombud.co.za	Website: www.nfosa.co.za	Website: www.fsca.co.za	Website: https://www.justice.gov.za/inforeg	Website: www.ncr.org.za

GENERAL CLIENT COMPLAINTS CONTACT DETAILS	
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SAHL Insurance	**insurance@sahomeloans.com** **Tel: 0861 103 740**

SAHL Group	**admin@sahomeloans.com** **Tel: 0861 888 777**
Risk & Compliance	**SAHLComplaintsHandling@sahomeloans.com**